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AMERICAN BAR ASSOCIATION

May 22, 2008

Via E-mail and Express Mail

Annie Galipeau
Senior Competition Law Officer
Competition Bureau
Place du Portage 1
50 Victoria Street
Gatineau, Quebec K1A 0C9

Re: Comments to Canadian Competition Bureau on its Draft Bulletin on Corporate Compliance Programs

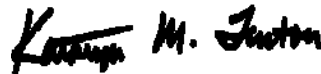
Dear Ms. Galipeau:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the Canadian Competition Bureau on its Draft Bulletin on Corporate Compliance Programs.

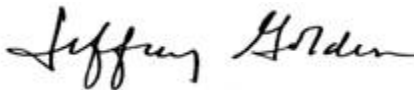
Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

If you have any questions after reviewing this report, we would be happy to provide further comments.

Sincerely,



Kathryn M. Fenton
Chair, Section of Antitrust Law



Jeffrey B. Golden
Chair, Section of International Law

Attachment